

**REMARKS**

Reconsideration and allowance of this application, as amended, is respectfully requested.

This Amendment is in response to the Office Action dated September 19, 2007. Appreciation is expressed to the Examiner for reopening prosecution after reviewing the arguments presented in the Appeal Brief.

Reconsideration and allowance of this application, as amended, over the 35 USC §103 rejection based on Nishi (USP 5,724,544) in view of the newly cited reference to Robinson (USP 3,588,248) is respectfully requested. By the present Amendment, each of the independent claims has been amended to define that the control module:

“Refers to a table for selecting an arbitrary one or more of said nonvolatile semiconductor memories.”

This newly claimed feature with regard to the control module is in conjunction with the control module sending a first erase command to one of said plurality of nonvolatile semiconductor memories to initiate a first internal erase operation of data.

It is respectfully submitted that neither the previously cited reference to Nishi nor the newly cited reference to Robinson teaches or suggests this claimed feature of the control module referring to a table for selecting an arbitrary one or more of the nonvolatile semiconductor memories. Concerning this, the primary reference to Nishi fails to disclose the claimed data erasure operation of one nonvolatile semiconductor memory while another nonvolatile memory carries out the data erasing operation. In addition, the primary reference to Nishi completely fails to teach or suggest the claimed table operating in conjunction with the control module.

With regard to the newly cited reference to Robinson, this reference discloses a flash memory card which includes card control logic and plural flash memories. In particular, this reference teaches that several active flash EEPROM groups can be enable for simultaneous erase operations. However, Robinson does not disclose that the card control logic sends a first erase command to one flash EEPROM and, afterwards, sends a second erase command to another flash EEPROM within a predetermined period. In addition, Robinson fails to teach or suggest the amended feature of the control module referring to a table for selecting an arbitrary one or more of the nonvolatile semiconductor memories. Therefore, it is respectfully submitted that the amended independent claims 1 and 16 clearly define over the combination of Nishi and Robinson.

Reconsideration and allowance of the dependent claims is also respectfully requested. These claims, when considered in combination with the respective parent independent claims, define overall combinations which are neither taught nor suggested by the cited prior art. Therefore, particular consideration and allowance of these dependent claims is also respectfully requested.

If the Examiner believes that there are any other points which may be clarified or otherwise disposed of either by telephone discussion or by personal interview, the Examiner is invited to contact Applicants' undersigned attorney at the number indicated below.

To the extent necessary, Applicants petition for an extension of time under 37 CFR §1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to the Antonelli, Terry, Stout & Kraus, LLP

Deposit Account No. 01-2135 (Docket No. 1487.32253CC8), and please credit any excess fees to such deposit account.

Respectfully submitted,  
**ANTONELLI, TERRY, STOUT & KRAUS, LLP**

By /Gregory E. Montone/  
Gregory E. Montone  
Registration No. 28,141

GEM/dks  
1300 North Seventeenth Street, Suite 1800  
Arlington, Virginia 22209  
Telephone: (703) 312-6600  
Facsimile: (703) 312-6666